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6  
7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
9 SAN JOSE DIVISION

10  
11 UNITED STATES OF AMERICA, ) No. CR -12-00527- PSG  
12 Plaintiff, )  
13 v. ) **STIPULATION TO CONTINUE THE**  
14 KATHLEEN BORKENAGEN, ) **STATUS HEARING TO JUNE 28, 2013;**  
15 Defendant. ) **~~PROPOSED~~ ORDER**  
16 \_\_\_\_\_ ) HONORABLE PAUL S. GREWAL

17 **STIPULATION**

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19 Defendant and the government, through their respective counsel, subject to the court's  
20 approval, hereby stipulate that the Court continue the status hearing in the above-captioned  
21 matter, presently scheduled for June 27, 2013, at 9:30, to June 28, 2013, at 9:30 a.m., or at an  
22 hour convenient to the court. The reason for the stipulation is as follows. Counsel for the  
23 defense and the government are close to a resolution of the matter, but need additional time to  
24 confer, review documents provided by the defense and conduct some additional investigation.

25 The parties further agree and stipulate that the time from and including June 27, 2013,  
26 through and including June 28, 2013, should be excluded pursuant to Speedy Trial Act, 18

1 U.S.C. §3161(h)(7)(A) and (B)(iv) to provide counsel reasonable time to prepare. Accordingly,  
2 the United States and the defendant agree that granting the requested exclusion of time will serve  
3 the interest of justice and outweigh the interest of the public and defendant in a speedy trial.

4 Dated: June 25, 2013

5 \_\_\_\_\_/s/\_\_\_\_\_  
MANUEL ARAUJO,  
6 Assistant Federal Public Defender

7 Dated: June 25, 2013

8 \_\_\_\_\_/s/\_\_\_\_\_  
TIMOTHY J. LUCY,  
9 Assistant United States Attorney

10 **~~PROPOSED~~ ORDER**

11 Good cause appearing and by stipulation of the parties, it is hereby ordered that the  
12 hearing in the above-captioned matter is continued from June 27, 2013 to June 28, 2013. It is  
13 further ordered that the period of delay from June 27, 2013, through and including June 28,  
14 2013, is excluded for purposes of Speedy Trial Act computations pursuant to Title 18, United  
15 States Code, Sections 3161(h)(7)(A) and 3161(h)(7)(B)(iv).  
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17 Dated: June 25, 2013

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HONORABLE PAUL S. GREWAL,  
19 United States Magistrate Judge  
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